

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

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In re:

Wisconsin & Milwaukee Hotel LLC,

Debtor.

Case No. 24-21743-gmh  
Chapter 11

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**FIRST SUPPLEMENTAL DECLARATION OF MICHAEL P. RICHMAN  
UNDER BANKRUPTCY RULE 2014**

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I, Michael P. Richman, hereby declare as follows:

1. I am a member of the law firm of Richman & Richman LLC ("**R&R**" or the "**Firm**"), whose offices are located at 122 W. Washington Avenue, Suite 850, Madison, Wisconsin, 53703. I submit this First Supplemental Declaration of Michael P. Richman Under Bankruptcy Rule 2014 ("**First Supplemental Declaration**") pursuant to Fed. R. Bankr. P. 2014(a), and in further support of the Notice and Application of Debtor for Authority to Retain and Employ Richman & Richman LLC as Counsel for the Debtor Effective as of April 10, 2024 (the "**Application**") [Doc 10], of Wisconsin & Milwaukee Hotel LLC, the debtor herein ("**Debtor**" or "**WMH**").

2. Unless otherwise stated, the facts set forth herein are based on my personal knowledge, upon records maintained by R&R in the ordinary course of business, and which have been reviewed by me or other R&R attorneys or employees at my direction, or upon information provided to me by other R&R attorneys or employees. To the extent any information disclosed in this declaration requires

amendment or modification as additional information becomes available, an additional supplemental declaration will be submitted to the court.

3. On April 9, 2024 (the “**Petition Date**”), the Debtor filed a Voluntary Petition for Non-Individuals Filing for Bankruptcy [Doc 1] commencing the above-captioned chapter 11 case (the “**Case**”).

4. The Debtor remains in possession of its property and is operating its business as a debtor in possession, pursuant to §§ 1107, 1108, and 1184 of Title 11 of the United States Code (“**Bankruptcy Code**”). The Debtor owns and operates the Milwaukee Marriott Downtown, a 205-room full-service, high-end hotel located at 625 N. Milwaukee Street, Milwaukee (the “**Hotel**”).

5. On April 10, 2024, the Debtor filed the Application, seeking entry of an order pursuant to §§ 327(a) and 330 of Bankruptcy Code; Rules 2014(a) and 2016 of the Federal Rules of Bankruptcy Procedure (“**Bankruptcy Rules**”); authorizing the Debtor to retain and employ the law firm of Richman & Richman LLC, effective as of April 10, 2024, as general bankruptcy counsel to the Debtor and its estate; and the Declaration of Michael P. Richman Pursuant to F.R.B.P. 2014(a) and in Support of Notice and Application of Debtor for Authority to Retain and Employ Richman & Richman LLC as Counsel for the Debtor Effective as of April 10, 2024 (“**Richman Declaration**”) [Doc 10 – Exhibit A].

6. Subsequent to the foregoing filings, R&R conducted a supplemental review of parties in interest in this case, to determine if there were any additional connections to be disclosed under Bankruptcy Rule 2014. As a result of such

supplemental review, R&R makes the following additional disclosures of connections with the Debtor, its creditors, and other parties in interest in this Case:

- a) In 2015, while a member of the now-dissolved law firm Steinhilber Swanson LLP, attorney Claire Ann Richman fka Claire Ann Resop (“**C. Richman**”), now a member of R&R, was tangentially involved in the representation of Robert W. Kraft (“Kraft”), or an entity in which he had an interest, as a purchaser in the Receivership of First Edge Solutions Inc., filed in the Circuit Court of Milwaukee County, Milwaukee, Wisconsin. Kraft is Chairman and CEO of FirstPathway Partners, which raised funding for the construction of the Hotel through FirstPathway’s EB-5 Immigrant Investor Program, and which may still have an economic interest in the outcome of the Case.
- b) R&R (and in the past, Steinhilber Swanson LLP) has represented General Beverage Sales Co. (one of the Debtor’s creditors and vendors) and several of its affiliates in matters unrelated to the Debtor. Additionally, R&R, by C. Richman and Attorney Eliza M. Reyes (“**Reyes**”) currently represents General Beer Distributors and General Beverage Sales Co. - Milwaukee in their capacities as general unsecured creditors and distributor in the chapter 11 case of *In re Karben4 Brewing, LLC*, Case Number 24-10358-cjf, United States Bankruptcy Court Western District of Wisconsin. That representation is completely unrelated to this Case.

7. Based on the foregoing, and the information provided in the Richman Declaration, I believe R&R: (a) does not hold or represent any interest adverse to the

Debtors in connection with the matters for which R&R will be engaged; and (b) is disinterested.

I declare under penalty of perjury under the laws of the United States that, based upon my knowledge, information and belief as set forth in this First Supplemental Declaration, the foregoing is true and correct to the best of my knowledge.

Executed in Madison, Wisconsin this 25<sup>th</sup> day of April, 2024.

A handwritten signature in blue ink, appearing to read "Michael P. Richman", is written over a horizontal line.

Michael P. Richman